

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

ANITA GIBBS; LAUREN RHOADES;
LAQUENZA MORGAN; ARCHIE SKIFFER,
JR.; TIMOTHY HALCOMB, individually and on
behalf of a class of all others similarly situated,

Plaintiff,

v.

CITY OF JACKSON, MISSISSIPPI; CHIEF
JAMES E. DAVIS, in his official capacity,

Defendants.

Civil Action No. 3:22-cv-99-KHJ-MTP

MOTION TO BE REMOVED AS PLAINTIFF

Plaintiff Anita Gibbs, through undersigned counsel, hereby requests, pursuant to Rule 21 of the Federal Rules of Civil Procedure, that she be removed as a plaintiff. In support thereof, Ms. Gibbs sets forth as follows:

1. Rule 21 provides that the Court "may at any time, on just terms, add or drop a party."
2. Ms. Gibbs has informed counsel that she no longer wishes to be a plaintiff in this matter and wants to be removed from the case altogether.
3. Because defendants have not been served with process or filed any responsive pleading, they will suffer no prejudice as a result of Ms. Gibbs being removed as a plaintiff.
4. This class action is brought by four additional plaintiffs who are qualified to serve as proper Rule 23 class representatives.

Based on the foregoing, Plaintiff Anita Gibbs respectfully requests that she be removed from this action. Plaintiff Gibbs requests further that her name not be listed in the style of the case following her removal as a party.

Respectfully submitted, this the 2nd day of March, 2022.

s/ Cliff Johnson

Cliff Johnson (MSB #9383)

MACARTHUR JUSTICE CENTER

University of Mississippi School of Law

481 Chucky Mullins Drive

University, Mississippi 38677

P: 601-915-6863

cliff.johnson@macarthurjustice.org

CERTIFICATE OF SERVICE

I hereby certify that I have this day filed the foregoing Motion with the Southern District of Mississippi's Electronic Court Filing system which sent notification of filing along with a copy of the filed document to counsel listed below:

Paloma Wu
Robert B. McDuff
Mississippi Center for Justice
5 Old River Pl., Suite 203
Jackson, Mississippi 39202
(601) 709-0857
pwu@mscenterforjustice.org
rmcduff@mscenterforjustice.org

s/ Cliff Johnson